

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
SALISBURY DIVISION**

CRAIG CUNNINGHAM,

Plaintiff,

v.

Case No. 1:24-CV-00221

**WALLACE & GRAHAM, P.C,
MONA LISA WALLACE, BILL
GRAHAM, WHITNEY
WALLACE WILLIAMS, MARK
P. DOBY, RHINE LAW FIRM,
P.C., JOEL R. RHINE,
SOKOLOVE LAW, LCC, AND
RICKY A. LEBLANC,**

Defendants.

**CONSENT MOTION TO EXTEND TIME TO RESPOND
TO COMPLAINT
(Fed. R. Civ. P. 6(b)(1)(A))**

Defendants, Wallace & Graham, P.A., Mona Lisa Wallace, Bill Graham, Whitney Wallace Williams, Mark P. Doby, Rhine Law Firm, P.C., Joel R. Rhine, Sokolove Law, LLC, and Ricky A. LeBlanc (collectively, “Defendants”), pursuant to Fed. R. Civ. P. 6(b)(1)(A), LR 6.1(a) and 7.1 and through counsel, without waiving any defenses including without limitation for insufficient process, insufficient service of process, and lack of personal jurisdiction, hereby respectfully move the Court for a 30-day extension of time in which to respond to the Complaint in this matter filed by the Plaintiff Craig Cunningham (“Plaintiff”) and show:

1. The Complaint was filed on March 12, 2024.¹
2. As such, the time for any of the named Defendants to file a response to the Complaint has not yet expired under Fed. R. Civ. P. 12.
3. One extension was previously granted for this deadline to provide Defendants time to review Plaintiff's Complaint and investigate the claims therein.²
4. Defendants require additional time to investigate Plaintiff's claims and prepare a response.
5. In accordance with Local Rule 6.1(a), the undersigned counsel has consulted with counsel for Plaintiff regarding this motion. Counsel for Plaintiff does not oppose the relief requested herein.

Wherefore, the Defendants respectfully request that the Court allow them an additional 30 days through and including May 29, 2024, by which to file their response to the Complaint.

¹ Dkt. 1

² Dkt. 5

This 24th day of April, 2024.

**WALLACE & GRAHAM, P.C, MONA
LISA WALLACE, BILL GRAHAM,
WHITNEY WALLACE WILLIAMS,
MARK P. DOBY, RHINE LAW FIRM,
P.C., JOEL R. RHINE, SOKOLOVE
LAW, LCC, AND RICKY A. LEBLANC**

By: /s/ Virginia Bell Flynn

Virginia Bell Flynn (NC Bar #59109)

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Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of April 2024, I electronically filed the foregoing *DEFENDANTS WALLACE & GRAHAM, P.C, MONA LISA WALLACE, BILL GRAHAM, WHITNEY WALLACE WILLIAMS, MARK P. DOBY, RHINE LAW FIRM, P.C., JOEL R. RHINE, SOKOLOVE LAW, LCC, AND RICKY A. LEBLANC'S CONSENT MOTION TO EXTEND TIME TO RESPOND TO PLAINTIFF'S COMPLAINT* with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record.

By: /s/ Virginia Bell Flynn
Virginia Bell Flynn (N.C. State Bar No. 59109)